

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
 ABDULLAHI HASHI (11))

CASE NO. 3:10-cr-00260
JUDGE HAYNES

DEFENDANT ABDULLAHI HASHI'S MOTION FOR THE COURT
TO ISSUE A SECOND STAY OF THE PROCEEDINGS BASED ON
THE GOVERNMENT'S DISCLOSURE OF DISCOVERY PACKET NO. 17

Defendant Abdullahi Hashi (11), by and through the undersigned counsel, moves this Honorable Court to issue a second stay of the proceedings, or to craft some other mechanism under the Sixth Amendment for the proper review of additional un-redacted documents provided today to defense counsel and labeled by the government as "Discovery 17."¹

In terms of case history, the parties left the courtroom on Monday, March 26, 2012 after the jury had been impaneled to hear this action, but sent home due to the government's failure to timely provided Jencks material and other documents pursuant to the Court's discovery orders. One of the items of concern that was not made available until Saturday, March 24, 2012 were the rough notes of the law enforcement officers who had investigated the matter, and particularly the rough notes as it applied to the numerous interviews with Jane Doe 2. It was brought to the Court's attention on Monday that many of the rough notes (over 1,000 total pages) were heavily redacted, and particularly the rough notes of Officer Weyker.

Even though the rough notes were redacted, undersigned counsel attempted on Monday

¹ Attached as **Exhibit A** is a copy of the government's email dated March 28, 2012, along with the material that undersigned counsel received at approximately 12:30 p.m. today.